

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KATHRYN HANEGRAAF	:	CIVIL ACTION
	:	
	:	
v.	:	
	:	
PAUL MORELLI DESIGN, INC.	:	
and PAUL MORELLI	:	NO. 2:16-CV-02848-LDD

OFFER OF JUDGMENT

TO: Kathryn Hanegraaf
c/o Andrew Dwyer, Esquire
Dwyer & Barrett, L.L.C.
17 Academy Street, Suite 1201
Newark, NJ 07102

c/o Patricia V. Pierce, Esquire
Greenblatt Pierce Engle Funt & Flores, LLC
123 South Broad Street, Suite 2500
Philadelphia, PA 19109

Notice is hereby given pursuant to F.R.C.P. 68 that Defendants, Paul Morelli Design, Inc. and Paul Morelli, offer to allow judgment be taken against them by the above-named Plaintiff, Kathryn Hanegraaf, in this action in the sum total of One Hundred and Twenty-Five Thousand Dollars (\$125,000.00), inclusive of all costs and attorneys' fees available under all local, state, and federal statutes and incurred and accrued through the date of this offer.

This offer of judgment is not and shall not be deemed to be an admission of liability or wrongdoing on the part of the Defendants, and liability for any of the claims, demands, or causes of action referred to in this lawsuit are specifically denied.

In accordance with F.R.C.P. 68, this offer shall be deemed withdrawn unless written notice of acceptance is received within fourteen (14) days after service hereof.

YOU ARE FURTHER NOTIFIED that under the terms of F.R.C.P. 68, in the event Plaintiff obtains a judgment against any or all of the Defendants for an amount not greater than the offer herein or, in the event either or all of the Defendants obtains a defense verdict, Plaintiff must pay all costs incurred by Defendants after making this offer of judgment and will be precluded from receiving an award against Defendants for attorney's fees and costs incurred after receipt of this offer of judgment.

WEBER GALLAGHER SIMPSON
STAPLETON FIRES & NEWBY LLP

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